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AUG 31 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
TELECOMMUNICATIONS CONSULTANT
HON. ROBERT E. LEE

OF COUNSEL
WRITER'S NUMBER
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0470

August 31, 1993

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Attention: Allocations Branch

RE: MM Docket No. 93-174
Reply Comments of Twin Lakes Communications, Inc.
Owensville and Versailles, Missouri

Dear Mr. Caton:

Transmitted herewith, on behalf of Twin Lakes Communications, Inc., licensee of KLGS (FM), Versailles, Missouri, are an original and four copies of its Reply Comments in the above-referenced proceeding.

Should any additional information be required, please contact this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH

Frank R. Jazzo
Frank R. Jazzo
Counsel for
Twin Lakes Communications, Inc.

FRJ/rhw
Enclosure
cc: Davel Broadcasting Group, Inc. (w/enclosure)

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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AUG 31 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of FM Allotments)
Owensville and Versailles, Missouri)

MM Docket No. 93-174
RM-8263

to: Chief, Allocations Branch

REPLY COMMENTS

Twin Lakes Communications, Inc. ("Twin Lakes"), licensee of FM station KLGs, Channel 236A, Versailles, Missouri, by its attorney, submits its Reply Comments to the Comments of William O'Dell, which were filed in response to the Notice of Proposed Rule Making ("NPRM"), MM Docket No. 93-174, DA 93-665, released June 25, 1993, wherein the Commission proposes to amend Section 73.202(b) of its Rules (the Table of FM Allotments), by substituting Channel 236C3 for Channel 236A at Versailles, Missouri, and modifying the license of KLGs to specify operation thereon, and by substituting Channel 237A for Channel 237C2 at Owensville, Missouri, and modifying the license of FM Station KLZE, Owensville, Missouri, to specify operation thereon. In support thereof, the following is stated:

As a preliminary matter, Twin Lakes submitted Comments on August 16, 1993, restating its support for the proposed channel substitutions at Versailles and Owensville, Missouri, and the proposed license modifications of KLGs and KLZE. Twin Lakes indicated that it would promptly implement the proposed upgrade of KLGs. No counterproposals were filed with respect to the Twin Lakes Comments.

The Comments of William O'Dell ("O'Dell Comments") were apparently filed with the Commission in this proceeding. No Certificate of Service as required by Sections 1.47 and 1.405 of the FCC's Rules was included with the O'Dell Comments. Thus, the filing is procedurally defective and should be stricken.

O'Dell is the president of Davel Broadcasting Group, Inc. ("Davel"), licensee of FM station KLZE, Owensville, Missouri. Davel's construction permit for modified, upgraded facilities for KLZE on Channel 237C2 at Owensville, Missouri (BPH-881110IB), expired on September 16, 1990, and was cancelled over two years later by FCC letter on October 22, 1992, because no FCC 307 or FCC 302 had been filed in connection with the application.

On April 1, 1993, the Commission sent Davel a letter advising it that unless it filed an FCC Form 301 application for a construction permit for Class C2 facilities within 30 days, it would be made a party to this rulemaking proceeding. Davel did not file such a construction permit application. Therefore, in the NPRM, the Commission deemed Davel to have abandoned its interests in the Class C2 allotment. The NPRM stated that at the termination of this proceeding, KLZE will be modified to specify operation on Channel 237A.

The O'Dell Comments do not address the Twin Lakes proposal directly and essentially only include the late-filed Petition for Reconsideration Davel filed on August 3, 1993, which seeks reinstatement of KLZE's Class C2 construction permit. As shown below, the Commission must disregard the O'Dell Comments and

approve the substitution of Channel 236C3 for Channel 236A at Versailles, Missouri, and modify the KLGS license accordingly.

While it is difficult to discern from the various and sundry papers included with the O'Dell Comments precisely what comprises the Petition for Reconsideration, it appears that the sum and substance of the KLZE Petition for Reconsideration is that Class C2 facilities were constructed and an FCC 302 was sent to the Commission, but was never processed by the Commission. In addition, Davel claims it never received notice of the cancellation of its construction permit. The letter, it claims, was sent to an old address.

There is substantial evidence, however, that Davel is lacking in candor and may be misrepresenting material facts to the Commission regarding KLZE's operation. As shown in the attached Declaration of James D. Fisher, President and General Manager of Twin Lakes, Mr. Fisher is personally aware that KLZE has been off-the-air for substantial periods of time over the past few years. A search of the Commission's records has revealed no request by Davel or grant by the Commission of authority for KLZE to be off-the-air. Ironically, included with the O'Dell Comments was Davel's August 16, 1993, request to take KLZE off-the-air, the only such request in the Commission's records, and made at a time when KLZE has actually been briefly returned to the air (albeit at reduced power apparently).

Mr. Fisher also visited the KLZE main studio address, as reflected in the Commission's records. There was no radio studio

there. The present occupant of the location said he has been there for the past two years and there has been no radio studio there. Twin Lakes searched the Commission's records and could find no notification by Davel of a change in the main studio location of KLZE. Further evidence of KLZE's lack of operation (or existence) can be seen in the attached pertinent pages from the 1992 and 1993 telephone book serving Owensville and the surrounding area. There is no telephone number listed for KLZE in either year's phone book edition.

Moreover, Davel's claims of not receiving mailings from the Commission do not ring true. As shown in Mr. Fisher's Declaration, the post office in Owensville has had a forwarding order for KLZE's address throughout the past two years. The station's mail, including certified mail, has been forwarded according to a postal official. Section 1.5 of the Commission's Rules places the burden on each licensee to furnish the Commission with an accurate and current address for serving documents or directing correspondence. Davel has not shown that it has advised the Commission of its various address changes.

On December 16, 1992, the Commission sent Davel a letter requesting a report on the station's operational status, a copy of which is attached hereto. Twin Lakes could find no response filed by Davel to this inquiry. In addition, Twin Lakes could find no Ownership Reports or annual Employment Reports filed for KLZE for the past four years. Attached is a copy of the Commission's December 15, 1992 letter inquiring as to the whereabouts of the

KLZE Ownership Report. Davel's last known legal counsel was served with a copy of the FCC's April 1, 1993 letter concerning this proceeding. All indications are that KLZE has not been operated significantly during the past few years and that when it has, the Commission's rules and procedures have been routinely ignored.

Davel's claim of having filed a license application in 1989 also strains credulity. Such a filing would have required a filing fee. Surely an applicant would wonder why its filing fee check had not cleared. A responsible licensee would also inquire as to why it had not received a license grant in nearly four years or at least a postcard noting the acceptance for filing of the license application.

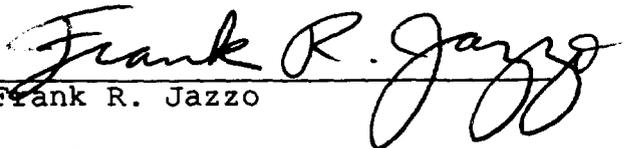
The evidence strongly suggests that Davel has abdicated all licensee responsibilities with respect to KLZE over the past few years. To reward Davel's indifference with the reinstatement of its Class C2 construction permit would greatly disserve the public interest. Twin Lakes stands ready, willing and able to improve KLGs's service to the public. Davel has had several years to make good on its commitment to bring Class C2 service to KLZE's listening area. KLZE has largely been off-the-air and has virtually ignored all licensee obligations in that period. KLZE should not be permitted to block KLGs's upgrade. Accordingly, the Commission should substitute Channel 237A for Channel 237C2 at Owensville, Missouri, and modify KLZE's license to specify operation thereon. Additionally, the Commission should substitute Channel 236C3 for Channel 236A at Versailles, Missouri, and modify

the license of KLGS to specify operation thereon.

WHEREFORE, for the foregoing reasons, Twin Lakes respectfully requests that the Commission amend Section 73.202(b) of the Commission's Rules by substituting Channel 236C3 for Channel 236A at Versailles, Missouri, and modify the license of KLGS to specify operation thereon.

Respectfully submitted,

TWIN LAKES COMMUNICATIONS, INC.

By: 
Frank R. Jazzo
Its Attorney

FLETCHER, HEALD & HILDRETH
11th Floor
1300 North 17th Street
Rosslyn, Virginia 22209
(703) 812-0400
August 31, 1993

rw.frj"c"\tlreplay.831

DECLARATION OF JAMES D. FISHER

DECLARATION

I, James D. Fisher, do hereby declare under penalty of perjury, that the following is true and correct to the best of my knowledge:

I am President and General Manager of Twin Lakes Communications, Inc. ("TLCI"), licensee of FM station KLGS, Versailles, Missouri. I am the individual responsible for directing the filing of TLCI's Petition for Rulemaking and Comments in support of the proposed upgrading of KLGS on Channel 236C3 at Versailles, Missouri, and the corresponding downgrading of FM station KLZE, Owensville, Missouri, from Channel 237C2 to Channel 237A, consistent with KLZE's licensed operation.

I have personal knowledge that KLZE has been off-the-air for substantial portions of the past few years. Operations resumed for a brief period approximately six months ago and then ceased again until approximately two weeks ago. The recent operations, I believe, have been at reduced power (approximately one to three kilowatts ERP). I have visited the authorized KLZE transmitter site and the current operations appear to be from a three-bay antenna haphazardly attached to the side of the tower at about the 175 feet level.

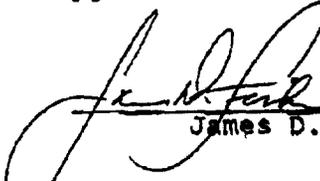
I visited the address shown in the FCC's records as being the main studio location for KLZE (309B North First Street, Owensville, Missouri). There is no radio studio located there. I spoke with the present occupant of that address. He said he has been located there for the past two years and that there has been no radio studio located there.

AUG-31-1993 12:04 FROM FLETCHER HEALD & HILDRETH TO

P.03

I spoke with Mr. Moeller at the Owensville Post Office. He said that while KLZE's mailing address has changed from 309B North First Street, Owensville, to P.O. Box 550, Owensville, to 984 N. Jefferson, Florissant, Missouri to Route 2, Owensville and then most recently to 3418 Douglas Road, Florissant, Missouri, a forwarding address order has been in place for the station for each of these locations at all times during the past two years and any piece of mail sent to their address, including certified mail, has been forwarded.

In the event KLGs is upgraded to operation on Channel 236C3 at Versailles, Missouri, TLCI will expeditiously apply for a construction permit for upgraded facilities, and, when granted, will promptly construct such upgraded facilities.



James D. Fisher

Executed this 31st day of August, 1993.

OWENSVILLE TELEPHONE LISTINGS

FIDELITY
TELEPHONE CO.

11TH CLARK
ST. LOUIS, MISSOURI 63080

IF FORWARD - DO NOT RETURN

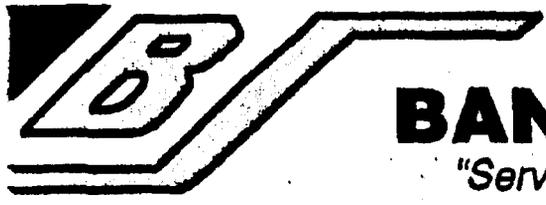
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CAR-RT PRESORT

September
1993

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PAID
Des Moines, Iowa
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SAT — 8:00-12:00
318 W. MAIN

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MON-THURS — 8:00-3:00
FRI — 8:00-6:00
SAT — 8:00-12:00

DRIVE-UP BANK

MON-WED — 8:00-5:00
THURS & FRI — 8:00-6:00
SAT — 8:00-1:00
SPRINGFIELD RD. & FISHER DR.



468-3191



FIDELITY AND BOURBONSE TELEPHONE COMPANIES

0-41560

24 JOHNSTON—KENNEDY

Johnston Doug & Linda RFD 1	468-3568
Johnston E L Jay E Euclid	468-6943
Johnston George 511 S Mansion	468-6548
Johnston John R 612 W Monroe	437-5734
Johnston Roy L 222 Marion Av	468-6885
Joiner Amos & Veda HC 65	468-2859
Jonas H D 305 E Jackson	437-2292
Jones Alan & Pam RFD 1	468-5118
Jones B A 85 Hannah	468-7678
Jones Brad & Karen 146 Oak	468-5750
Jones C 108 Melrose	237-2319
Jones Charlotte 1256 Timberlane	468-8738
Jones Christopher & Dianna 153 Ebenezer Rd Leslie	459-4184
Jones Christopher P RFD 2 Gerald	764-4351
Jones Clarence & Leona 394 E Euclid	468-6698
Jones Craig RFD 3	437-2661
Jones D Krautown Rd	437-3367
Jones Donald RFD 1	437-2043
Jones Earl R & Pamela L RFD 2	927-2085
Jones Edward D & Co 6 W Springfield	468-5845
Jones Fred & Linda 1589 Hwy AF	468-3890
Jones Gladys M 161 Virginia	468-5705
Jones Hazel P 202 Elmout Rd E	468-3147
Jones Herman White Oak Rd	468-2232
Jones J D 56 East	468-5332
Jones J David 56 East	468-8212
Jones J Oom 402 S 3rd	437-3867
Jones James W RFD 2 Gerald	764-3265
Jones Jerry & Shirley RFD 1 Sullivan	457-2031
Jones Jimmy & Nancy RFD 3	437-3628
Jones John B & Lieselotte 3013 Oak Haven Ln Bourbon	468-8634
Jones Kenneth & Sandy 199 Meramec Dr	468-7716
Jones Kenneth L 779 Hwy WW	468-3991
Jones Kent Debbie Ln	437-3255
Jones Leona & Kim RFD 2 Bourbon	468-8752
Jones Mark A & Katie A RFD 1 New Haven	459-2013
Jones Marie RFD 4	237-3592
Jones Melvin 310 Cherry	437-3191
Jones Michael E 204 E Jackson	437-3579
Jones Murrell L & Golf Dr	468-6632
Jones O H & Judi 326 Sappington Bridge Rd	468-3874
Jones Paul Edward 42 S Olive	468-6652
Jones R M RFD 1 Owensville	237-3790
Jones Roger Dale 517 S Main Gerald	764-2635
Jones Rodney L 183 Debbie Ln	437-5161
Jones Ronald RFD 1	437-4273
Jones Ronney & Elaine Red Oak Gerald	764-2310
Jones Stacy S Golf Dr	468-2613
Jones Thomas J RFD 4	468-4739
Jones Tim 1046 E Springfield Rd	468-5893
Jones Tim & Michele 1281 Watson	468-5278
Jones Tracey & Christie 1349 Watson Rd	468-4352
Jones Vanessa Ann RFD 1 New Haven	459-2015
Jones Victor L 408 E Peters	437-2633
Jones William F & Betty Jane RFD 3 Gerald	764-4442
Jorcke Brian 339 Brinkman Rd	437-4948
Jordan Almedia 433 Second	468-4664
Jordan Ernest & Mickey 66 East	468-6337
Jordan Frances 1025 Roscoe	468-6350
Jordan Gary RFD 3	437-5262
Jordan Rhonda 213 Thurman	237-2074
Jordan Rick L & Julianne 216 N Church	468-3723
Jordan Tommie 2717 Ridge Rd	468-6111
Jordan Virgil L RFD 1	437-5437
Jordan Jimmie D 752 Johanna	468-2084
Jose Clint Hwy 28 W	437-4440
Jose Jerry E RFD 1 Gerald	764-3520
Joseph Bradford L RFD 1 New Haven	459-6697
Joshua Mary 703 Haven Manor	237-2879
Joslin Christopher 247 George	468-8804
Joslin H E 1114 Aiden	468-6141
Joslin Paul & Karen 247 George	468-6889
Jost Bradford 105 W Jefferson	437-4438
Jost David RFD 1 Sullivan	627-3230
Jost Don & Suzie RFD 1 Rosebud	437-3538
Jost Fertilizer Service Inc RFD 3	437-3580
Jost Gwynn RFD 1	437-2844
Jost James RFD 3	437-3536
Jost Janet 113 Mevin	468-8973
Jost Jim & Alta Sue RFD 1 Cuba	437-3590
Jost Leo RFD 1	437-3416
Jost Leslie 559 Dunnigan	468-4618
Jost Maurice RFD 3	437-2845
Jost Ronald G Fairview Dr	437-3630
Jost Stanley RFD 3	437-3580

JOIST TIRE CO INC

116 E Peters 437-3123
Or 437-4222

Jovanovic Momcilo RFD 2	437-2784
Judy's Hair Fashions 501-A E Jefferson	437-3012
Juedemann Alberta RFD 3	437-3613
Juedemann Delwin RFD 1	834-3257
Juedemann Gene A 118 MacArthur	237-3627
Juedemann Gracie	834-5495
Juedemann Lon & Fern 118 Melrose	237-3251
Juenger Michael H RFD 1 Bland	437-2618
Juergens BHI Trailer Court 1608 E Springfield Rd	468-6029
Juergens Gary & Laura RFD 2	468-4120
Juergens H Dale & Nancy 1074 Acid Mine Rd	468-3020
Juergens Jim 298 North & South Rd	468-4565
Juergens Kevin D & Becky 838 E Vine	468-4919
Juergens Leslie 140 North & South Rd	468-6525
Juergens M E (Gene) & Florence 408 Taylor	468-4724
Juergens Merle & Shirley 421 Scottsdale	468-4505
Juergens P & D RFD 1	468-4748
Juergens Paul P 1064 Acid Mine Rd	468-3961
Juergens Paul Ins 647 Fisher Dr	468-4252
Juergens Ron 165 Pine Valley Sullivan	627-3329
Juergens Roy E 542 E Vine	468-6102
Julius Eugene RFD 1 Rosebud	764-2337
Julius Marie E 805 W Jackson	437-3722
Julius Russell H Sharon Rosebud	764-3814
Julius Thomas Rosebud	764-3785
Jump Betty RFD 2 Peaceful Valley	437-3361
Junk K Bart Debbie Ln	437-3496
Junk Laura 208 Canaan Rd Gerald	764-4759
Justus Tom RFD 3	437-3528

K

KOA Kampground 1451 E Springfield	468-8750
KTUI Radio Station N Service Rd	468-5101
Kabrick Gary RFD 2	437-3945
Kade Peter L 516 Sappington Bridge Rd	468-3062
Kage Glenn Sr RFD 1	468-8881
Kage Glenn H Jr 1154 Sappington Bridge Rd	468-7143
Kahle Ben RFD 2	437-2448
Kahle Landfill Inc Brinkman Rd	437-8117
Kahle Marvin RFD 1	437-4228

KAHLE REFUSE SERVICE

RFD 1 Brinkman Rd 437-2379

Kallmeyer Brad 100 Melrose	237-3854
Kamler Deid RFD 1 Sullivan	627-3309
Kamler John & Lisa 111 E Lincoln	437-4432
Kamler Ralph W RFD 1 Sullivan	627-3309
Kamper David RFD 1	437-4331
Kamper Delmer RFD 1 Gerald	764-3787
Kamper Donald RFD 1 Gerald	764-2519
Kamper Elmer H RFD 1 Gerald	764-3774
Kamper LeRoy RFD 1 Gerald	764-2503
Kamper Roscoe RFD 4	237-2336
Kamper Steve RFD 1	237-4093
Kamper Victor RFD 1 Gerald	764-3778
Kampschroeder Ewald RFD 1 Rosebud	764-2263
Kampschroeder Geo RFD 2 Gerald	764-3730
Kane I H 124 W Main	468-3402
Kannglasser Cora B Babcocke Terr	437-8315
Kappelmann Donald RFD 2	237-2586
Kappelmann Erwin 1007 Maupin	237-2456
Kappelmann Hattie Countryside Manor Gerald	764-3278
Kappelmann Lorraine A RFD 1	237-2541
Kappelmann Martha 904 Haven Manor	237-2403
Kappelmann Otto 304 Kenneth	237-2571
Karim Fazal 306 Circle Dr	237-3178
Karnie B J 4785 Valley	468-8625
Karnes Larry R 611 W Monroe	437-6743
Kasch Evelyn C RFD 2 Gerald	764-2585
Kase Cynthia R Hwy 100 W	237-2870
Kase Dale RFD 1 Berger	237-2630

KASE ELECTRIC

164 Brewer Rd 468-6928

Kase Jim & Margie 164 Brewer Rd	468-5977
Kase Stuart RFD 3	237-2507
Kasal Oscar O RFD 1	237-2117
Kassebaum Alvina 503 Haven Manor	237-3181
Kassebaum David 208 Bates	237-2981
Kassebaum Henry Mrs Haven Manor Dr	237-2211
Kassebaum Lee 174 Hwy YY Leslie	459-6597
Kassebaum Leonard RFD 2 Leslie	459-6707
Kassebaum Lloyd & Karen Hwy YY Leslie	459-6116
Kassebaum Lowell 152 Hwy YY Leslie	459-6216
Kassebaum Mark D RFD 1	237-3609
Kassebaum Marvin RFD 2	237-2507
Kassebaum Vernon RFD 1 New Haven	459-6517
Kassing D Cris 224 George	468-2127
Kauffeld Deborah R RFD 4	237-3112
Kaufman Allen G 229 Sewell	468-8760
Kaufman Michael & Robin 3 Sherwood Ln Sullivan	927-5769
Kavanagh Hermit Hwy E	237-2277

KAY CARPET INC

RFD 1 437-3805

Kay Wm RFD 1	437-3805
Kays Patrick E 446 Scottsdale	468-8590
Keathley R O RFD 1 Rosebud	437-4912
Keating John R RFD 2 Peaceful Valley	437-4721
Keeling William RFD 1	437-3901
Keen Bobby 211 Oak	468-3422
Keenan Clyde 401 Maple	468-7073
Keens Clyde & Jacquie RFD 1 Cuba	437-5252
Keener John V RFD 2 Hermann	237-2371
Keeney Bob RFD 1 Cuba	437-2971
Keeney Bob D & Pam RFD 1 Cuba	437-4315
Keeney Eugene W 124 Marvin	468-6709
Keeney Fraida 323 Jones	468-8615
Keeney Harold J 342 Jones	468-8375
Keeney Steve RFD 1 Cuba	437-4704
Keeven Heating & Cooling RFD 1 Or RFD 1 New Haven	237-2175 459-2135
Keeven Larry & Sarah RFD 1 New Haven	459-2070
Keeven Mike A RFD 1 New Haven	459-4519
Keeven Ronald RFD 1 New Haven	459-2077
Keeven Thomas RFD 2 Bourbon	468-2298
Kehr L Chris RFD 1	237-2476
Kehr Tim Concrete Flatwork RFD 1 Rosebud	437-2308 437-3381
Keightley James E RFD 2	437-3381
Kellholz Paul & Lisa 608 E Jefferson	437-4618
Keithley Sandy D 635 2nd	468-7052
Kell Allen Woodland Lakes	468-7594
Kell Claude 509 S 1st	437-3085
Kell Clinton J Crest Haven Pl	237-2651
Keller Terry & Robin RFD 3	437-5274
Kellermann Rosemary 1020 Dogwood Ln	468-6765
Kellett Jerry D RFD 2 Sullivan	927-2100
Kellett Jerry D RFD 2 Sullivan	927-5565
Kelley Ernest W & Melba J RFD 2 Antioch Rd Gerald	764-4164 764-2018
Kelley James C & Annette RFD 1 Rosebud	468-5213
Kelley Ray & Shirley 791 Hwy WW #3	237-2076
Kelley Wm H 409 Bates	437-3595
Kellmann's Landscaping RFD 2	468-4095
Kelly Robert Michael 331 E Vine	468-3635
Keltner Garry & Betty 1019 Countryside	237-4311
Kelly Pack 1138 Industrial Dr	237-4311

KEM-LAB CO

60 Shamrock Ln 468-8514
Kern-Lab Rentals 49 Shamrock Ln 468-8514

KEM-SPRAY-PEST CONTROL SERVICE

69 Shamrock Ln 468-8514

Kenna Leroy H RFD 3	437-4609
Kenna Rick & Becky RFD 3	437-4774
Kemp David RFD 2 Bland	437-4712
Kemp Howard RFD 1 Sullivan	627-3377
Kemp Leslie R RFD 1 New Haven	459-6633
Kemper Duane Elfish Rd	237-2290
Kemper John Mrs RFD 1 Berger	237-2295
Kemper Marlin Berger	834-5476
Ken Roy Farm	834-5315
Ken-Roy Hatchery Berger	834-5217
Kendrick Robert 309A S Olive	468-3339
Kennedy Clarence G HC 65	468-4675

KENNEDY-KOHNE 25

Kennedy Theodore J RFD 1 New Haven 459-6406
 Kennedy Theodore J RFD 1 New Haven 459-6542
 Kennedy Thomas P 431 Hughes Ford Rd 468-6850
 Kenny Connie L RFD 2 Bland 437-4769
 Kent Robert & Jan RFD 1 834-5360

KENTUCKY FRIED CHICKEN
 144 S. Service Rd 468-4222

Kough Lee & Shirley RFD 2 468-8177
 Kray Everett D 4733 Valley Dr 468-4914
 Kraly Kenneth M RFD 2 Sullivan 927-5511
 Kray Raymond C Juedemann Rd 437-3960
 Krause Sid 4111 Hermann 437-3039
 Krause Danny R & Sandra 48 Golf Dr 468-5377
 Krause L R Clark 468-1219
 Krause Kevin & Cheryl 6 Fig 468-2223
 Krause Michael John RFD 1 834-5424
 Krauseon Hallie M Maramac 927-4658
 Krause Cloyd C & Marita 437-5551
 Krause Curt & Sheilan 437-3389
 Krause L Washington 437-2444
 Krause Richard 437-2444
 Krause Willford Sunrise Motel 468-4460
 Krause Julius Roy 106 W Washington 437-2896
 Krause Harry RFD 2 New Haven 459-6642
 Kreller Adolph RFD 1 Gerald 764-3791
 Kreller Eugene Rosebud 764-2414
 Kreller James 313 Cedar Gerald 764-2507
 Kreller Kenneth RFD 1 Gerald 764-3672
 Kreller Lucile & Glenda 764-3735
 Kreller Raymond 325 E Springfield Gerald 764-3485
 Krome Victor RFD 2 Peaceful Valley 437-3077
 Key Blake & Candy 900 E Vine 468-4093
 Key Kenneth RFD 1 Sullivan 627-2026
 Key Larry RFD 2 Sullivan 927-5347
 Key Leonard RFD 2 468-3310
 Key Maxene 871 Elmont Rd W 468-8381
 Key Rebecca RFD 2 468-2409

KID COUNTRY DAY CARE-PRÉ
SCHOOL 78 Hughes Ford Rd 468-6195
 Kilburn James & Jimmy RFD 4 468-5062
 Kilkenny John J RFD 1 468-3927
 Killion Donald E Dr DDS 732-4483
 Killion Timothy M 11 Fox Run Gerald 764-3342
 Kim Song Ye Last Ridge Gerald 764-4070
 Kimberlin John L 702 Tipton 468-6790
 Kinnel Phillip J Hwy 100 834-5530
 Kinsler Bertha M 508 Madison 437-2424
 Kinsler Steve E 215 S Olive 468-2505
 Kinsler Sylvester RFD 2 Bourbon 468-8744
 Kinsler Jeff 80 Hannah 468-3835
 Kinsler Larry & Linda 1055 Louisiana 468-4644
 Kinsler Eugene F & G Ruth 223 N Walnut 437-6388
 Kinsler Flossie 502 Pine 437-2672
 Kinsler John S 109A N 1st 437-2749
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Owensville	437
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Lyon	459
Sullivan	468,860
Japan	627
Gerald	764
Rosebud	764
Berger	834
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30
JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
T W T F S	S M T W T F S	S M T W T F S	S M T W T F S	S M T W T F S	S M T W T F S
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1993

JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE
T W T F S	S M T W T F S	S M T W T F S	S M T W T F S	S M T W T F S	S M T W T F S
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JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
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 Kleinberg Monte & Diana N Service Rd 927-5242
 Kleinendienst Jarold RFD 4 237-2666
 Kleinheider Alice 108 Locust 237-3376
 Kleinheider James RFD 1 New Haven 834-3383
 Kleinheider Kevin RFD 2 237-3507
 Kleinheider Mark & Tammy 102 McNair 237-2991
 Kleinheider Randy A RFD 2 237-2051
 Kleininger Walter 15 Oak Ridge Rd 468-5211
 Klier Ed RFD 1 Gerald 764-3939
 Kiewer Robert & Rhonda 802 Miller 237-3567
 Kline Dave & Pat RFD 1 Seminary Rd 468-5709
 Kline Jacqueline Faye 428 Elmont Rd 468-5334
 Kline Janet RFD 2 Gerald 764-3261
 Kline Jerry & Janet Sappington Bridge Rd 468-2163
 Kline L T RFD 2 Bourbon 468-3507
 Kline M E 328 Maple 468-4687
 Kline Phillip D RFD 4 468-9969
 Kline Raymond RFD 4 468-6442
 Kline Raymond Jr Watson Rd 468-6324
 Kline Robert & Betty Canaan Rd Gerald 764-3703
 Klinger Robert B 927-5235

Kloppel Frank H Jr RFD 2 Shtwell Rd Gerald 764-2790
 Kloppel Gary & Elaine RFD 1 437-2250
 Kloppel James G Canaan Rd Gerald 764-4033
 Kloppel Larry & Mary Dee 7 Edgewood Dr 468-6041
 Kloppel Ray & Sherry RFD 1 New Haven 459-6620
 Klopheus Merlin RFD 1 Berger 237-2394
 Klopheus Saline 602 Haven Manor 237-2708
 Kloppe Craig RFD 2 237-2821
 Kloppe Herbert RFD 2 237-3718
 Kloppe Keith RFD 2 237-2730
 Kloppe Kim & Barb RFD 2 237-3553
 Kloppe Lee RFD 1 237-3127
 Kloppe Terry RFD 1 237-2385
 Kloppe Theo RFD 1 237-2535
 Klos Douglas RFD 1 437-2146
 Kluesner Rita Mrs 701 Haven Manor 237-2491
 Klusmeyer Alice RFD 2 Gerald 764-2255
 Klutt Clifford RFD 1 Berger 237-2087
 Kneahans Dennis & Christina 450 E Springfield 468-2220
 Kneahans Doug Owensville 437-3842
 Kneahans Doug Ints Ofc 105 E Paters Res Owensville 437-3842
 Kneahans Gerard RFD 1 437-3619
 Kneahans M A 103 W Madison 437-2830
 Kneahans Matt D & Barb Peaceful Valley Lake Ests 437-5300
 Kneahans Roy RFD 1 437-2305
 Knight Doug RFD 3 437-4424
 Knight Randy 612 S Sixth 437-4823
 Knight Sheila RFD 2 437-2822
 Knight Terry 104 S 7th 437-3313
 KNIGHT'S CANDY SALES 104 S 7th 437-2810
 Knott C M RFD 1 Rosebud 437-3859
 Knuckles Theims 717 Lakeview 468-2419
 Koch Ben J RFD 1 Gerald 237-2472
 Koch C W Roy Hwy E 237-2893
 Koch Cassie 154 Modern 468-8822
 Koch Clifford 332 E Euclid 468-4094
 Koch Dale RFD 1 237-3629
 Koch Donald Jr 384 E Euclid 468-6164
 Koch Edward 403 S 9th 437-3503
 Koch Edward H L 307 E Franklin 437-3800
 Koch Edwin H RFD 3 437-5271
 Koch Harold & Odell 310 Bates 237-2519
 Koch James O 623 Sarah 468-8652
 Koch Joseph W RFD 4 237-2335
 Koch Kent 56 N Mansion 468-3643
 Koch Kevin & Vicky 227 Miller 468-3969
 Koch Mark RFD 2 237-2686
 Koch Mark & Caroline RFD 1 834-3532
 Koch Melvin RFD 2 437-2345
 Koch Raymond 222 Orchard 468-4366
 Koch & Sons Well Drilling & Pump Service RFD 1 Sullivan 627-3359
 Koch Stanley & Sue RFD 1 Sullivan 627-3359
 Koch V M RFD 2 468-6719
 Koch Wm RFD 1 627-3252
 Kocinski Mike RFD 3 437-4240
 Koppbe Eugene R & Jean 1224 Timberlane 468-8671
 Koebel Clifford RFD 2 437-3382
 Koehn Kurt Jr 588 Crawford Circle Dr 468-4057
 Koehn Realtors see Coldwell Banker Koehn Realtors
 Koehn Realtors 891 S Service Rd W Or 468-4422
 Koehn Jack 2111 State Rd J Sullivan 468-6874
 Koelling Earl RFD 627-2011
 Koelling Hadley 549 N Mansion 627-3370
 Koelling James K RFD 1 Leslie 468-8840
 Koelling James K RFD 1 Leslie 764-3527
 KOELLING LUMBER INC 32 N Clark 468-4188
 Koelling Noel W RFD 2 437-3000
 Koelling Norris RFD 1 627-3340
 Koelling Ted 1249 Eagle Dr 468-3588
 Koenig Fred 106 E Franklin 437-3475
 Koenig Herman T 437-2715
 Koenig William E Jr 927-3595
 Koenig William E Sr & Betty 736 Lakeview 468-3557
 Koepke Chester RFD 1 Cuba 437-3154
 Koepke Donald RFD 1 437-2638
 Koepke Edgar 204 N Walnut 437-2338
 Koepke Fred 1110 S Bernhardt Gerald 764-3506
 Koepke Gary RFD 1 Gerald 764-3976
 Koepke Harold W 608 Plum 437-2042

New Haven 237
 Owensville 437
 Spring Bluff 457
 Lyon 459
 Sullivan 468
 Japan 627
 Gerald 764
 Rosebud 764
 Berger 834
 Stanton 927

Koepke James RFD 1 Cuba 437-2047
 Koepke Jeffrey G RFD 1 437-4002
 Koepke Kerry 56 Hannah 468-4793
 Koepke Ricky & Joyce RFD 1 437-5134
 Koepke Velma Mrs RFD 3 437-2843
 Koester Elmer W RFD 3 437-3739
 Koester Julius RFD 1 Owensville 237-2409
 Koewring Kristy & Tracey RFD 2 New Haven 459-6658
 KOHL CITY FURNITURE RFD 4 New Haven 834-5323
 Kohlbusch Alvin L RFD 1 Hermann 237-2306
 Kohlbusch Eddie RFD 1 Berger 237-2568
 Kohlbusch Glen RFD 4 237-2680
 Kohlbusch Sanford RFD 1 237-3786
 Kohlbusch Timothy & Janis RFD 1 237-2446
 Kohler J M 412 W Franklin 437-4203
 Kohne Bill & Karen RFD 2 927-5560
 Kohne Dennis RFD 1 834-5598
 Kohrmann Aaron RFD 2 437-3153
 Kohrmann Kenneth RFD 3 437-2763
 Kohrmann Steve RFD 1 Bland 437-2642
 Kohrmann Thomas G 201 E Monroe 437-4501

KOLB & LAYMAN CPA'S
 20 Hughes Ford Rd 468-5548

Kolb Lorean RFD 2 Gerald 764-2901
 Kolbe Gerald RFD 1 Hermann 237-2297
 Kolbe John W RFD 1 Cuba 437-4997
 Kolkmeier Edward J Rosebud 764-3892
 Koonrad Paul RFD 2 New Haven 764-3487
 Koonce Don & Cheryl 31 Grace 468-6024
 Koonce Jeff & Sherry 402 E Madison 437-5218
 Koonce Trica 225 N Park 468-6396
 Koonce's Carpet & Upholstery Cleaning 31 Grace 468-8608
 Kopcha Nicholas RFD 2 Gerald 764-2058
 Kopmann Al RFD 1 237-3115
 Kopmann Edward J RFD 3 237-2065
 Kopmann Farms Inc RFD 1 237-3115
 Kopmann Geo RFD 1 237-2563
 Kopmann Joe & Kelly RFD 1 Hwy 100 E 237-3435
 Kopmann Ralph RFD 1 237-2464
 Kopp Aloys Berger 834-5422
 Kopp Larry RFD 1 Gerald 237-2577
 Koppelman Andy RFD 1 468-3820
 Koppelman David RFD 1 468-8337
 Koppelman George H Jr 211 E Beck 764-3662
 Koppelman John H Jr 678 Watson 468-8394
 Koppelman Ray 81 Koppelman Ln 468-6296
 Koppelman Richard H RFD 1 Gerald 764-3620
 Korasick Lester A RFD 1 459-6524
 Korczynna Joe J 612 E Madison 437-2525
 Kordick Earl & Karen RFD 1 Sullivan 627-2017
 Korff Charles 911 Springfield Rd 437-3304
 Korff Roger RFD 3 437-3884
 Kormeler Alfred RFD 1 459-6543
 Kormeler Alice 601 New Haven Manor 237-3135
 Kormeler Homer 311 S 4th 437-2795
 Kormeler James RFD 1 459-6547
 Kormeler Jeff RFD 1 459-6489
 Korte Robert L Sr 927-5735
 Korver A K 414 W Main 468-2237
 Kosark Randy RFD 1 Bland 437-3161
 Kosark Ray RFD 2 437-2982
 Koski Felix Oak Grove Trlr Ct 468-4706
 Koski Robert P & Judy 904 Lynwood Ln 468-6691
 Kossman Gilbert F RFD 4 237-3394
 Kossman Arthur 311 W Franklin 437-2811
 Kossmeyer Robert RFD 3 437-3301
 Kottmann Craig & Marlene RFD 4 237-3140

DECEMBER 16, 1992 LETTER

RE: KLZE OPERATIONAL STATUS

FCC MAIL SECTION

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

DEC 17 3 35 PM '92

16 DEC 1992

332 W
IN REPLY REFER TO:
1800B3-GDG

Davel Broadcasting Group, Inc.
309-B N. First Street
Owensville, Missouri 65066

In re: KLZE (FM) Owensville, Missouri
Operational Status Inquiry

Dear Licensee:

This letter concerns the referenced station.

Our office recently received an inquiry stating that KLZE apparently ceased broadcast operations. Since our records do not reveal any notification to this effect, you are required to notify this office within thirty days of the date of this letter regarding the station's operational status.

We note that Section 73.1740(a)(4) of the Commission's Rules permits commercial FM stations to cease broadcast operations if conditions beyond the control of the licensee dictate such action. In this situation, licensees are required to maintain any prescribed tower lighting and to notify this office no later than the tenth day of station silence.

If stations must continue station silence for a period exceeding thirty days, Section 73.1635 of our Rules require that the licensee request special temporary authority to continue this silence. This request must detail both the continued necessity for station silence and the steps proposed to resolve the station's problems. In addition, certification (suggested format enclosed) that neither the licensee nor any party thereto is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

If you have any questions regarding the content of this letter, please contact Glenn Greisman, Industry Analyst, at (202) 632-3954.

Sincerely,

Ed Jorgensen
for Dennis Williams
Chief, FM Branch
Audio Services Division
Mass Media Bureau

Enclosure

DECEMBER 15, 1992 LETTER

RE: KLZE OWNERSHIP REPORT

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN REPLY REFER TO:

December 15, 1992

Davel Broadcasting, Inc.
936 Rim Rock Trail
Columbus, GA 31904

Gentlemen:

This is in reference to the 1992 annual ownership report for station
KLZE(FM), Owensville, MO.

Pursuant to Section 73.3615 of the Commission's Rules, each licensee of a commercial radio or television broadcast station is required to file an ownership report (FCC Form 323) once a year on the anniversary of its station's license renewal application filing date. If there has been no change since the last filing of FCC Form 323, a letter may be filed in lieu of a new report, stating that the previously filed report has been examined and is currently accurate and complete. When the licensee, however, is a partnership that is comprised entirely of natural persons or a sole proprietorship (i.e., the station is licensed to an individual(s)), the annual reporting requirement does not apply.

On October 1, 1992, non-exempt licensees of commercial broadcast stations located in the States of Florida, Puerto Rico, Virgin Islands, Alaska, Guam, Washington, Iowa, Missouri, Samoa, Oregon and Hawaii were required to update their initial reports. Where changes in the ownership and other information required to be reported have occurred since the filing of the licensee's earlier report, a new complete FCC Form 323 must be filed. If no changes have occurred, the licensee may certify to that fact, instead of submitting a new report.

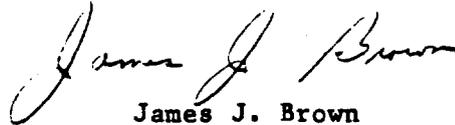
A review of our records does not reflect that you have submitted the required report or certification for your station for 1992. In accordance with the above requirements, it will be necessary for you to complete and submit the enclosed FCC Form 323, or a statement of certification advising that no changes have occurred in the ownership reporting information previously furnished and supplying the filing date of that report and the call letters of the station for which it was submitted. This submission should be filed no later than 20 days from the date of this letter.

On May 21, 1990, the Commission implemented the new congressional-mandated fee schedule. Public Law No. 101-239, 103 Stat. 2106 (1989). The new fee collection program utilizes a U.S. Treasury lock box in Pittsburgh, PA for maximum efficiency of collection and processing. All annual ownership reports or statements of certification, which are filed on or after May 21, 1990, must be submitted under the new rules. A fee processing form (FCC Form 155) must accompany each station's annual ownership report and remittance, and this package must then be mailed or otherwise delivered to the appropriate post office box address at the Mellon Bank in Pittsburgh, PA.

To assist you, we are also enclosing a copy of the "Mass Media Services Fee Filing Guide," which includes FCC Form 155 as an attachment, and a copy of a June 6, 1990 Public Notice regarding broadcast annual ownership reports and the new fee program. These enclosures contain all the information you need to comply with the new requirements.

Should you have any questions concerning this letter or require further information regarding the Commission's annual ownership report filing requirements, contact LeAudrey Alexander, Chief, Ownership Section, Mass Media Bureau at Telephone Number (202) 632-7258.

Sincerely,



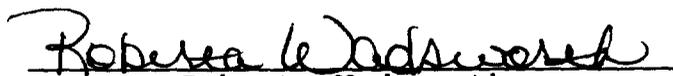
James J. Brown
Assistant Chief
Video Services Division
Mass Media Bureau

Enclosures

CERTIFICATE OF SERVICE

I, Roberta Wadsworth, a secretary in the law offices of Fletcher, Heald & Hildreth, hereby certify that I have on this 31st day of August, 1993, had copies of the foregoing "REPLY COMMENTS" mailed by U.S. Mail first class, postage prepaid, to the following:

Davel Broadcasting Group, Inc.
3418 Douglas Road
Florissant, Missouri 63034


Roberta Wadsworth